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# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Roy Romer  
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February 17, 1993

### ADMIN RECORD

Mr. Richard J. Schassburger  
U. S. Department of Energy  
Rocky Flats Plant  
P. O. Box 928  
Golden, Colorado 80402-0928

Re: Amendment to OU-4 IM/IRA Decision Document

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) are hereby responding to a letter from James K. Hartman to the undersigned dated January 25, 1993 seeking approval for amendments to the IM/IRA Decision Document.

The Division and EPA concur with DOE's request to:

- 1) Provide a connection to allow ITS water to be pumped directly from the modular tanks to B374 for treatment. However,
  - o DOE must continue and expedite treatment of pond water in the B374 evaporators,
  - o ITS water must be stored in the surge tanks, subject to available capacity, and
  - o First priority for use of B374 available capacity will be for the treatment of pond water followed by the treatment of ITS water.

If high ITS water flow rates are experienced or anticipated before excess pond water is processed in B374 or before B910 is operational, DOE may cease treating pond water and begin to lower surge tank levels to accommodate expected ITS flows. When sufficient capacity has been reestablished to the surge tanks, DOE must resume the treatment of pond water.

- 2) Divert ITS water to the modular tanks following completion of the B374 connection and prior to B910 Evaporators becoming operational.
- 3) Permanent removal of the .020" ultraviolet liners from all three tanks.
- 4) Maintain approximately 18" of ITS water in the contingency "empty tank" to prevent high winds from lifting and tearing the liners, with the provision that the contingency may be completely emptied to clean the bottom, make repairs, or for eventual decommissioning and removal.
- 5) Replacement of the B910 basement sump with a containment tank to facilitate leak detection. (DOE must meet additional regulatory requirements, if any, resulting from the change from a sump to a tank.)
- 6) Modify language to state that B910 Evaporator bottoms will not exceed concentrations of 400,000 ppm.

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- 7) Modify language on pages 3-6, 3-8 and 3-9 (or elsewhere) of the IM/IRA DD to clarify that B910 distillate may, as stated on page 3-1, "... be reused as makeup water in the raw water system or condensate systems on plant site." Sampling and analysis of the distillate, as set forth in the DD, shall remain the same whether the water is sent to the raw water system or condensate systems. (This amended item is in response to a latent verbal request for modification.)

In Mr. Hartman's letter of January 25, reference is made to a revised IM/IRA Milestone Schedule (Table 3.2). (We assume that Attachment 1 of the letter is intended as a replacement for Table 3.2.) However, as stated in our letter of February 16, 1993, we will not approve a revised schedule to supersede the original schedule included in the IM/IRA DD (Table 3.2). We reserve our rights to assess stipulated penalties dating from the original milestone dates.

Lastly, we acknowledge the commitment that the Radio Frequency portion of the Telemetry System for surge tank leak detection will be operational before water is transferred to the tanks. Should this fail to occur, DOE is not permitted to transfer water from the ITS to the tanks without further approval from the Division and EPA.

A copy of your letter of January 25, 1993, and this letter, must be inserted into each official copy of the IM/IRA DD upon receipt. A final decision on the State permit modification incorporating the DD, and these amendments, will be issued in the near future.

While we do not believe that these changes to the IM/IRA DD are significant enough to warrant the issuance of an Explanation of Significant Differences (ESD), DOE should inform the public of these changes in the next monthly newsletter.

If you have any questions please contact Harlen Ainscough of the Division at 692-3337 or Arturo Duran of EPA at 294-1080.

Sincerely,



Gary W. Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program  
Colorado Department of Health



Martin Hestmark, Manager  
Rocky Flats Project  
U. S. Environmental Protection Agency

cc: Daniel S. Miller, AGO  
Jackie Berardini, CDH-OE  
James K. Hartman, DOE  
Frazer Lockhart, DOE  
Scott Surovchek, DOE  
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